



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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April 29, 2025

**By ECF**

The Honorable John G. Koeltl  
United State District Judge, Southern District of New York  
Daniel Patrick Moynihan United State Courthouse  
500 Pearl St., Courtroom 14A  
New York, NY 10007

*DailyPay, LLC v. Attorney General Letitia James*, No. 25 Civ. 2849 (S.D.N.Y.)  
*People of the State of New York v. DailyPay, Inc.*, No. 25 Civ. 3439 (S.D.N.Y.)

Dear Judge Koeltl:

We write jointly on behalf of all parties in the above-captioned actions, which have been related by the Court, and under Paragraph I.C of Your Honor's Individual Practices to respectfully request an adjournment of the time to move, answer, or otherwise respond to the Complaint or Petition in each of the above-captioned actions. The New York State Office of the Attorney General ("OAG") intends to move to remand the action captioned *People of the State of New York v. DailyPay, Inc.* Because of the overlap of substantive issues involved in the two above-captioned actions, the parties request that the responsive pleading deadline in both actions follow the same schedule and be adjourned until after the Court has ruled on the OAG's forthcoming motion for remand. Such an adjournment would promote efficiency and conserve judicial resources and the resources of the parties. The original deadline for the OAG to move, answer, or otherwise respond to the Complaint in *DailyPay, LLC v. James* is May 1, 2025. The original deadline for DailyPay, Inc. to move, answer, or otherwise respond to the Petition in *People of the State of New York v. DailyPay, Inc.* is May 6, 2025. This is the parties' first request for an adjournment.

Respectfully submitted,

By: /s/ Marcus A. Asner

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By: /s/ Christopher L. Filburn

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